

## REMARKS

### *The Pending Claims*

Claims 1-6 and 10 are currently pending. Claim 1 is directed to a printing system comprising a multi-color lithographic printing press and an off-press plate-making apparatus. Claims 2-6 and 10 depend from claim 1.

### *Summary of the Office Action*

The Office has objected to the abstract because it contains the legal phraseology "means." The disclosure is objected to for reciting informalities. Claim 3 is objected to for reciting informalities. Claims 1-4, 7 and 8 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Vermeersch et al. (EP 802,457) in view of Koguchi et al. (U.S. Patent No. 6,082,263) and Muth (U.S. Patent No. 5,623,877). Claims 5 and 6 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Vermeersch et al. in view of Koguchi et al. and Muth, further in view of Barnett et al. (U.S. Patent No. 5,308,746). Claims 9 and 10 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Vermeersch et al. in view of Koguchi et al. and Muth, further in view of Rombult et al. (U.S. Patent No. 6,085,657). Reconsideration of these rejections and objections is respectfully requested in view of the amendments to the claims and the remarks set forth herein.

### *The Amendments to the Specification*

The specification has been amended to remove references to particular claim numbers. No new matter has been added by way of these amendments.

### *The Amendments to the Abstract*

The abstract has been amended to remove the term "means" by reciting "apparatus." No change in scope of the disclosure or claims is intended by this amendment.

No new matter has been added by way of these amendments.

### *The Amendments to the Claims*

Claims 7-9 have been cancelled.

Claim 3 has been amended to recite "uniform" in lieu of "continuous" so as to be consistent with claim 1, as suggested by the Office. Further, the term "a substrate" has been rewritten as "the substrate" to reflect that the substrate has been previously recited. The

dependent claims have been amended to recite "The printing system of claim 1" in the preamble to reflect the amendments to claim 1. No change in the scope of the claims is intended by these amendments.

Further, claim 1 has been amended to more distinctly claim and particularly point out the present invention. In particular, claim 1 has been amended to incorporate the subject matter of claims 7, 8 and 9. No new matter has been added by way of these amendments.

*Discussion of the Objections to the Specification*

In view of the amendment to the specification, the objection is considered moot. As such, withdrawal of the objections is respectfully requested.

*Discussion of the Objection to the Abstract*

In view of the amendment to the abstract, the objection is considered moot. As such, withdrawal of this objection is respectfully requested.

*Discussion of the Objections to the Claims*

In view of the amendment to claim 3, the objection is considered moot. As such, withdrawal of the objections is respectfully requested.

*Discussion of the Obviousness Rejections*

The Office has rejected the pending claims primarily over Vermeersch et al. in view of Koguchi et al. and Muth under 35 U.S.C. § 103(a). In addition, the Office has relied on Barnett et al. and Rombult et al. as secondary references. In view of the amendments to the claims, and the remarks as set forth herein, the rejections are considered moot.

As described in the present application, the use of stackers between the multi-color printing press and the plate-making apparatus allows for the coating, exposing and/or cleaning of materials for several color stations with *a single* coating, exposure and/or cleaning apparatus (page 10, lines 29-33). This is made feasible because the stacking apparatus acts as a buffer for temporary storage between one apparatus and the next apparatus in the cycle. Thus, the stacking apparatus acts as a temporary storage for printing plates for each color station in the multi-color printing press and makes automation of the process possible. Nothing in the art cited (except Rombult et al.) provides any teaching or fair suggestion of a stacker, let alone one between the multi-color press and the plate-making

device, which allows the *sequential preparation* of all the plates *while the press is printing the previous job*.

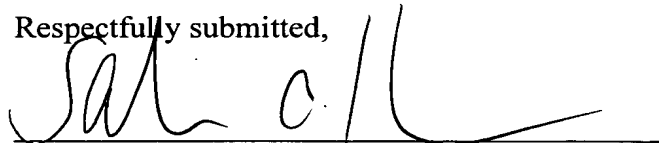
Whereas Rombult et al. does mention the use of stackers in relation to imagesetters or platesetters in which media needs to be redirected in a transverse direction. There is simply no teaching or suggestion to use stackers for combining *a single coating, exposure and cleaning apparatus* with a whole multi-color printing press. As such, one of skill in the art would not be motivated to combine the disclosure of Rombult et al. with any of the other references cited by the Office. Even if the references were to be combined, the stackers of Rombult et al., would nevertheless be insufficient to remedy the deficiencies of Vermeersch et al., Koguchi et al., and Muth to teach or fairly describe the invention as recited in the amended claims. A stacker to permit redirection of media in a transverse direction cannot be said to render obvious a stacker for combining a single coating exposure and cleaning apparatus. As such, even assuming arguendo, that the combination of references cited by the Office can be properly combined, the combination nevertheless fails to teach or fairly suggest the invention as recited in the amended claims.

For the foregoing reasons, the prior art cited by the Office (*i.e.*, Vermeersch et al., Koguchi et al., Muth, Barnett et al., and Rombult et al.) cannot be said to render obvious, and therefore unpatentable, the pending claims as amended. As such, withdrawal of the rejections is respectfully requested.

### *Conclusion*

The application is considered in good and proper form for allowance, and the Examiner is respectfully requested to pass this application to issue. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,



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